

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States Courts
Southern District of Texas
FILED

March 31, 2023

Nathan Ochsner, Clerk of Court

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Case No. **4:23-mj-634**

United States Postal Service Priority Mail Express Parcel
EI 268 014 119 US

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

United States Postal Service Priority Mail Express Parcel EI 268 014 119 US currently located at 4600 Aldine Bender Rd., Houston, TX 77315

located in the Southern District of Texas, there is now concealed (identify the person or describe the property to be seized):

Controlled substances and/or proceeds

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 USC 841(a)(1)	Distribution of a controlled substance
21 USC 846	Conspiracy

The application is based on these facts:
(See Attached Affidavit)

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Christopher J. Farmer, U.S. Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
Telephone (specify reliable electronic means).

Date: March 31, 2023

City and state: Houston, Texas



Judge's signature

Andrew M. Edison, United States Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In the Matter of the Search of:	§ § § § §	Case No. 4:23-mj-634
United States Postal Service Priority Mail		
Express Parcel EI 268 014 119 US		

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, Christopher J. Farmer, being duly sworn, state the following:

1. I am a Postal Inspector with the United States Postal Inspection Service (“USPIS”). I have been employed by the USPIS for approximately ten (10) years and am currently assigned to the USPIS Houston Division Contraband Interdiction & Investigations Team. I have received advanced training by the USPIS in the investigation of controlled substances and proceeds/payments being transported through the United States Mail.

2. I make this affidavit in support of a warrant pursuant to Rule 41 to search a package, further described in paragraph 9, to seize the things described in Attachment A.

3. Since May 2013, I have participated in multiple investigations into violations of the Controlled Substances Act involving the United States Postal Service (“USPS”) and discussed my investigations with other experienced law enforcement officers. For these reasons, I am familiar with how drug traffickers use the mail to facilitate their trafficking.

4. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

BACKGROUND

5. Experience and drug trafficking intelligence information gathered by the USPIS have demonstrated that the U.S. Postal Service (“USPS”) Priority Mail Express and Priority Mail are frequently utilized by drug traffickers for shipping controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances. Use of Priority Mail Express and Priority Mail are favored because of the speed (Priority Mail Express - overnight; Priority Mail - two-day delivery), reliability, free telephone and Internet package tracking services, as well as the perceived minimal chance of detection. Priority Mail Express was originally intended for urgent, business to business, correspondence. Intelligence from prior packages, which were found to contain controlled substances, or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances, has indicated that these parcels are usually addressed from an individual to an individual. Priority Mail Express is seldom used for individual to individual correspondence.

6. In an effort to combat the flow of controlled substances through the overnight delivery services, interdiction programs have been established in cities throughout the United States by the USPIS. These cities have been identified as known ‘sources’ of controlled substances. The USPIS conducts an ongoing analysis of prior packages mailed through overnight delivery services, which were found to contain controlled substances or proceeds/payments of controlled substance sales. The analysis of prior packages, which were found to contain controlled substances, or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances, indicated that these parcels are usually sent from an individual to an individual. In the few cases when overnight delivery packages containing controlled substances, or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances, have displayed a business or company name, it has usually proven to be fictitious or used without the owner’s knowledge and

consent. Additionally, this analysis has established a series of characteristics which, when found in combination of two (2) or more, have shown a high probability that the package will contain a controlled substance, or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances. Information collected by the USPIS has demonstrated that the presence of these characteristics is significant for delivery services, to include USPS Priority Mail Express and Priority Mail, Federal Express, and United Parcel Service. This profile includes, but is not limited to, the following characteristics: package mailed from or addressed to a narcotic source city; package has a fictitious return address; package addressee name is unknown at the destination address; package sender name is unknown at the return address; package has address information which is handwritten; package is mailed to or from a Commercial Mail Receiving Agency (CMRA); package is addressed from an individual to an individual; phone numbers listed on the package are not related to the listed parties or are not in service; packages are wrapped and/or heavily taped; frequency of the mailings is inconsistent with normal use absent a business relationship; and the ZIP Code from where the package is mailed is different than the ZIP Code used in the return address.

7. The USPIS analysis of prior narcotics packages mailed through overnight delivery services has consistently shown that the identification of source cities has proven to be one of several reliable characteristics used in identifying suspect parcels. This analysis has also demonstrated that narcotics parcels originating from states other than source locations have been consistently found to contain designer drugs, such as Ecstasy, GBL, GHB, Anabolic Steroids, and other similar controlled substances. Generally, such designer drugs are not organic and are the product of a laboratory process.

STATUTES VIOLATED

8. It is Affiant's belief that based upon information discovered, violations of the following statutes are being investigated; Title 21 USC Sec. 841(a)(1) (Distribution/Manufacturing/Possession with intent to Distribute), Title 21 USC Sec. 846 (Conspiracy and Attempt), Title 21 USC Sec. 844 (simple possession), and Title 18 USC Sec. 1956 (Money Laundering).

TARGET PARCEL

9. This affidavit is made in support of an application for a federal search warrant to search USPS Priority Mail Express Parcel EI 268 014 119 US (the "Subject Parcel") described more particularly as follows:

Subject Parcel:	Priority Mail Express Parcel EI 268 014 119 US
Sender:	H.S Bullies 5511 Paraiso Pl Houston TX 77091 (713) 591-3713
Addressee:	Rashad Phillips 6161 Centinela Ave Culver City CA 90230
Size:	Brown USPS ReadyPost Cardboard Box Approx. 12.25" x 3" x 17.625"
Postmarked:	March 29, 2023
Postmark Origin:	Houston, TX 77018
Postage Amount:	\$105.20
Weight:	8 lbs., 15 oz.

PROBABLE CAUSE

10. On or about March 30, 2023, the Subject Parcel was observed at the North Houston Processing and Distribution Center (“N HOU P&DC”), within the Southern District of Texas. A review of the Subject Parcel noted that it bore several characteristics indicative of a parcel which likely contained a controlled substance or moneys furnished or intended to be furnished towards the purchase of controlled substances.

11. The Subject Parcel had the following characteristics: it was mailed utilizing Priority Mail Express service from a known source/destination state (TX) to a known source/destination state (CA); mailed business to person; had address information that is handwritten; and was mailed without a business account.

12. On or about March 30, 2023, Affiant conducted an open records query of the sender information listed on the Subject Parcel which revealed “5511 Paraiso Pl, Houston, TX 77091” is a valid address; however, Affiant was unable to associate the business name “H.S. Bullies” with the sender address. In addition, Affiant queried Texas Secretary of State records and was unable to locate the business “H.S. Bullies” registered with the State of Texas. Affiant knows based upon his training and experience that narcotics traffickers often use fictitious names and addresses, or incomplete/incorrect sender information, in order to conceal their true identities from law enforcement.

13. On or about March 30, 2023, Affiant contacted the listed sender phone number of (713) 591-3713. Affiant advised he was trying to reach “HS Bullies.” Affiant spoke to a female who refused to provide her name. The female advised she believed the Subject Parcel contained books. The female was vague and/or refused to answer/provide information when asked whether she had mailed the Subject Parcel, whether the Subject Parcel contained a large amount of drugs or money, and whether she had a phone number for the recipient “Rashad Phillips.” The female refused to provide consent to search the Subject Parcel.

14. On or about March 30, 2023, Affiant conducted an open records query of the recipient information listed on the Subject Parcel which revealed “6161 W Centinela Ave,

Culver City CA 90230” is a valid address; however, Affiant noted the address corresponded to the Hilton Los Angeles Culver City. Affiant also noted that the recipient information failed to list the name of the hotel or a room number. On or about March 30, 2023, Affiant contacted the Hilton Los Angeles Culver City, but the hotel would not confirm whether “Rashad Phillips” was a guest at the hotel. Affiant also noted the recipient information failed to list a telephone number for “Rashad Phillips.” Affiant knows based upon his training and experience that narcotics traffickers often use fictitious names and addresses, or incomplete/incorrect recipient information, in order to conceal their true identities from law enforcement. Affiant also knows based upon his training and experience that narcotics traffickers often utilize hotels/motels to send and receive contraband in an effort to conceal their activities from law enforcement.

15. On or about March 30, 2023, Affiant queried postal business records and noted the sender paid cash for the mailing of the Subject Parcel. Affiant noted the Subject Parcel bore a postage amount of \$105.20, an unusual amount for what is typically business correspondence mail.

16. On or about March 30, 2023, Affiant obtained the assistance of Officer R. Calderon, a Canine Officer (“K9”) with the Houston Police Department and certified handler of K9 “Bingo”. Officer Calderon and “Bingo” are certified as a team in the detection of controlled substances. Officer Calderon and “Bingo” received their certification through the National Narcotic Detector Dog Association (“NNDDA”). “Bingo” has numerous hours of training in the detection of controlled substances such as Marijuana, Cocaine, Methamphetamine, MDMA and Heroin. “Bingo” has successfully alerted on concealed controlled substances in numerous prior cases, which has led to the arrest of numerous suspects for drug law violations. “Bingo” was last certified in June 2022.

17. At Officer Calderon’s direction, “Bingo” was allowed to examine the Subject Parcel along with three (3) “dummy” boxes (boxes containing no suspected controlled

substances, in fact empty boxes) on the floor in different locations known not to be contaminated with the odor of controlled substances. “Bingo” conducted an exterior examination of the Subject Parcel and “dummy” boxes. Officer Calderon advised that “Bingo” indicated a positive alert to the presence of a controlled substance scent coming from within the Subject Parcel.

CONCLUSION

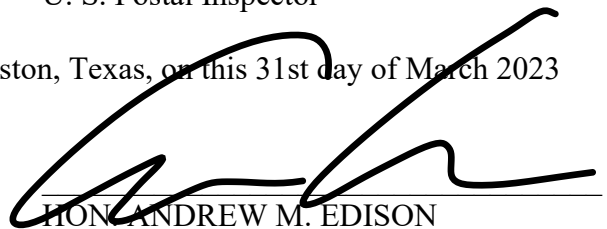
18. Based on the facts set forth above, there is probable cause to believe the Subject Parcel contains one or more controlled substances, drug paraphernalia, proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances, and material relating to the distribution of same. In the past, all the above factors have been indicative of packages which contained illegal controlled substances, or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances.

19. The Subject Parcel is currently in the custody of your Affiant. Affiant, therefore, seeks the issuance of a search warrant for the search of the Subject Parcel for any such controlled substance, proceeds/funds for controlled substances or evidence, fruits of crime, and instrumentalities, in violation of Title 21, United States Code, Sections 841(a)(1), and 846.



Christopher J. Farmer
U. S. Postal Inspector

Subscribed and sworn to me by telephone at Houston, Texas, on this 31st day of March 2023 and I find probable cause.



HON. ANDREW M. EDISON
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Property to be seized.

Any and all evidence, including but not limited to physical items, records and data relating to violations of Federal Narcotics Laws, including It is affiant's belief that based upon the investigation, the following statutes may have been violated; Title 21 USC Sec. 841(a)(1) (Distribution/Manufacturing/Possession with intent to Distribute), Title 21 USC Sec. 846 (Conspiracy and Attempt), Title 21 USC Sec. 844 (simple possession), and Title 18 USC Sec. 1956 (Money Laundering), those violations involving unknown subjects and occurring after March 12, 2023, through present, including:

- a. Any and all controlled substances, the possession of which are in violation of Title 21 USC Sec. 841(a)(1), and other federal narcotics and controlled substances laws;
- b. Records and information relating to the identity or location of the suspects;
- c. Identifying information, including but not limited to fingerprints, DNA or other identifying material;
- d. Cash money, united states currency, foreign currency, checks, or any other form of value payment;